

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION

CATHERINE OKORO
Plaintiff,

v.
PYRAMID 4 AEGIS and
JEROME BATTLES

Case No.: 2:11-CV2-00267

PLAINTIFF'S FINAL PRETRIAL REPORT

A. SUMMARY STATEMENT OF THE FACTS OF THE CASE

This Court issued a decision on April 23, 2012, finding that Ms. Okoro was employed by Defendants under the Fair Labor Standards Act, 29 U.S.C. §201 *et seq.*, and that Defendants, jointly and severally, owe Ms. Okoro minimum wage for the hours that she worked. The sole issue for this trial is to determine the number of hours that Ms. Okoro worked for Defendants. Ms. Okoro will present evidence of her work that will include, but not be limited to, contemporaneous time records she kept while employed; evidence of work product from her time of employment; and Ms. Okoro's own testimony of the work she performed and the time she spent doing this work.

B. STATEMENT OF THE ISSUES

How many hours did Ms. Okoro perform compensable work for Defendants.

C. NAMES AND ADDRESSES OF ALL WITNESSES EXPECTED TO TESTIFY

Catherine Okoro
8585 North 106th Street
Milwaukee, WI 53224

Jonlisa Covington
6490 North 106th Street
Milwaukee, WI 53224

D. EXPERT WITNESSES

Plaintiff does not anticipate calling any expert witness for the trial.

E. LIST OF EXHIBITS TO BE OFFERED AT TRIAL

- Exhibit 1: Certificates of Achievement
- Exhibit 2: Catherine Okoro Time Sheets
- Exhibit 3: Time Sheets of other employees
- Exhibit 4: Catherine Okoro Employee Job Description
- Exhibit 5: Paychecks documentation sent to Ms. Okoro
- Exhibit 6: Pyramid 4 Aegis Pamphlet
- Exhibit 7: Cover letters and facsimile cover sheets from Ms. Okoro
- Exhibit 8: June 22, 2009 letter from Ms. Okoro advertising the facility
- Exhibit 9: Letter from Silver Connections to Ms. Okoro
- Exhibit 10: Contact list with handwriting
- Exhibit 11: Notes for first employee mandatory meeting
- Exhibit 12: Employee disciplinary action
- Exhibit 13: Communication from Ms. Okoro to Unemployment Hearing office regarding a defendant employee.
- Exhibit 14: Letter from Ms. Stewart dated November 29, 2011
- Exhibit 15: Communications from Ms. Okoro regarding residents
- Exhibit 16: Letter from Mr. Eby to Ms. Okoro dated April 29, 2010
- Exhibit 17: Paycheck information for Ms. Battles
- Exhibit 18: email dated 4/28/2010 from Ms. Okoro
- Exhibit 19: email dated 4/27/2010 to Ms. Okoro
- Exhibit 20: emails dated April 23, 2010 from Jill Kennedy to Catherine Okoro
- Exhibit 21: email dated 4/14/2010 re: intake paperwork
- Exhibit 22: email from Silver Connections referral alert
- Exhibit 23: email dated March 10, 2010 from Catherine Okoro
- Exhibit 24: email dated February 24, 2010 from Catherine Okoro
- Exhibit 25: email dated January 5, 2010 from Catherine Okoro
- Exhibit 26: email dated January 4, 2010 from Catherine Okoro
- Exhibit 27: email dated December 18, 2009 from Catherine Okoro
- Exhibit 28: email dated December 11, 2009 from Catherine Okoro
- Exhibit 29: email dated December 1, 2009 to Catherine Okoro
- Exhibit 30: email dated November 30, 2009 from Catherine Okoro
- Exhibit 31: email dated September 25, 2009 to Catherine from Goodwill
- Exhibit 32: email dated September 18, 2009 between Catherine Okoro and Liz Kirsch

Exhibit 33: email dated September 14, 2009 regarding business cards for Ms. Okoro and Mr. Battles
Exhibit 34: email dated September 4, 2009 regarding the community care budget
Exhibit 35: email dated May 12, 2010 to Catherine and Lacrechia from Goodwill Industries.

F. DESIGNATION OF ALL DEPOSITIONS OR PORTIONS OF TRANSCRIPTS OR OTHER RECORDINGS OF DEPOSITIONS TO BE READ INTO THE RECORD OR PLAYED AT TRIAL AS SUBSTANTIVE EVIDENCE.

None.

G. COUNSEL'S BEST ESTIMATE ON THE TIME NEEDED TO TRY THE CASE.

One day.

H. ALL PROPOSED QUESTIONS THAT COUNSEL WOULD LIKE THE COURT TO ASK ON VOIR DIRE.

Please see attached.

I. PROPOSED SUBSTANTIVE INSTRUCTIONS

Please see attached.

J. PROPOSED VERDICT FORM.

Please see attached.

Dated at Wauwatosa, Wisconsin this 11th day of September, 2012.

RESPECTFULLY SUBMITTED:

s/Rebecca L. Salawdeh

Rebecca L. Salawdeh

Salawdeh Law Office, LLC

7119 W. North Avenue

Wauwatosa, WI 53213

Phone: 414-455-0117

Fax: 414-918-4517

Email: rebecca@salawdehlaw.com

s/Marni Willenson

Marni Willenson

Willenson Law, LLC

542 S. Dearborn Street, Ste. 610

Chicago, IL 60605

Phone: 312-546-4910

Fax: 312-261-9977

Email: marni@willensonlaw.com

Attorneys for Plaintiff